

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

ELIZABETH DE COSTER, *et al.*, on behalf of
themselves and all other similarly situated,

Plaintiffs,

v.

AMAZON.COM, INC., a Delaware
corporation,

Defendant.

No. 2:21-cv-00693-JHC

**STIPULATED MOTION AND ORDER
REGARDING SEALING OF MOTION TO
COMPEL BRIEFING**

NOTE ON MOTION CALENDAR:
August 19, 2024

DEBORAH FRAME-WILSON, *et al.*, on
behalf of themselves and all other similarly
situated,

Plaintiffs,

v.

AMAZON.COM, INC., a Delaware
corporation,

Defendant.

No. 2:20-cv-00424-JHC

CHRISTOPHER BROWN, *et al.*, on behalf of
themselves and all others similarly situated,

Plaintiffs,

v.

AMAZON.COM, INC., a Delaware
corporation,

Defendant.

No. 2:22-cv-00965-JHC

1 The Parties have met and conferred with respect to the upcoming briefing on Plaintiffs'
2 Motion to Compel, and anticipate that their briefs, declarations, and exhibits will quote from
3 and/or describe in detail a significant amount of information that has been designated as
4 Confidential or Highly Confidential-Attorneys' Eyes Only by Amazon. Accordingly, in order to
5 ensure that such materials are treated appropriately under the applicable protective order, and to
6 reduce burdens on the Court, the Parties, pursuant to LCR 7(d)(1) and 10(g), and their respective
7 counsel, hereby stipulate and agree to the following procedure for filing and sealing in
8 connection with the motion to compel briefing, subject to the Court's approval.

9 1. Pursuant to LCR 5(g)(2), each Party will provisionally file under seal its briefs
10 (including any opening, response, and reply briefs), declarations, exhibits, and all other evidence
11 and declarations on which that Party relies (collectively, "Motion to Compel Papers") which
12 contain material designated Confidential or Highly Confidential-Attorneys' Eyes Only by
13 Amazon.

14 2. Within two weeks of the filing of Plaintiffs' reply brief, pursuant to LCR 5(g), the
15 Parties will meet and confer and, as appropriate, file (1) public versions of their Motion to
16 Compel Papers, with necessary redactions, and (2) corresponding motion(s) to seal pursuant to
17 LCR 5(g)(3). The Party seeking to maintain material under seal (or under redaction) shall be the
18 movant for purposes of any such motion(s) to seal associated with the Parties' Motion to Compel
19 Papers.

20 IT IS SO STIPULATED THROUGH COUNSEL OF RECORD.
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1 DATED August 19, 2024.

Respectfully submitted,

2 HAGENS BERMAN SOBOL SHAPIRO LLP

3 By: /s/ Steve W. Berman

4 Steve W. Berman (WSBA No. 12536)

5 By: /s/ Barbara A. Mahoney

6 Barbara A. Mahoney (WSBA No. 31845)

1301 Second Avenue, Suite 2000

7 Seattle, WA 98101

Telephone: (206) 623-7292

8 Facsimile: (206) 623-0594

Email: steve@hbsslaw.com

barbaram@hbsslaw.com

9 Anne F. Johnson (*pro hac vice*)

10 594 Dean Street, Suite 24

11 Brooklyn, NY 11238

Telephone: (718) 916-3520

12 Email: annej@hbsslaw.com

13 KELLER POSTMAN LLC

14 Zina G. Bash (*pro hac vice*)

15 111 Congress Avenue, Suite 500

16 Austin, TX 78701

Telephone: (512) 690-0990

17 Email: zina.bash@kellerpostman.com

18 Jessica Beringer (*pro hac vice*)

19 Shane Kelly (*pro hac vice*)

150 North Riverside Plaza, Suite 4100

20 Chicago, IL 60606

Telephone: (312) 741-5220

21 Email: Jessica.Beringer@kellerpostman.com

Email: shane.kelly@kellerpostman.com

22 *Interim Co-Lead Counsel for Plaintiffs*
23 *and the proposed Class*

DAVIS WRIGHT TREMAINE LLP

By: /s/ John A. Goldmark

John A. Goldmark, WSBA #40980

By: /s/ MaryAnn Almeida

MaryAnn Almeida, WSBA #49086

920 Fifth Avenue, Suite 3300

Seattle, WA 98104-1610

Telephone: (206) 622-3150

Email: JohnGoldmark@dwt.com

Email: MaryAnnAlmeida@dwt.com

PAUL, WEISS, RIFKIND, WHARTON &
GARRISON LLP

Karen L. Dunn (*pro hac vice*)

William A. Isaacson (*pro hac vice*)

Amy J. Mauser (*pro hac vice*)

Martha L. Goodman (*pro hac vice*)

Kyle Smith (*pro hac vice*)

2001 K Street, NW

Washington, D.C. 20006-1047

Telephone: (202) 223-7300

Email: kdunn@paulweiss.com

Email: wisaacson@paulweiss.com

Email: amauser@paulweiss.com

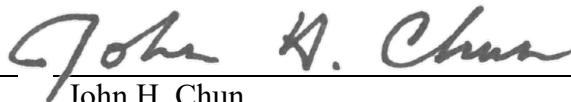
Email: mgoodman@paulweiss.com

Email: ksmith@paulweiss.com

Attorneys for Defendant Amazon.com, Inc.

1 IT IS SO ORDERED.

2
3 August 19, 2024



4 Dated

John H. Chun

United States District Judge